

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) KANDI JONES,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-16-1020-R
)	
(1) STANDARD CONSULTING, and,)	Oklahoma County CJ-16-3950
(2) STANDARD TESTING AND)	
ENGINEERING COMPANY,)	
)	JURY TRIAL DEMANDED
Defendants.)	

NOTICE OF REMOVAL

COMES NOW the Defendant Standard Testing and Engineering Company, and hereby files this Notice of Removal pursuant to 28 U.S.C. § 1441, et seq. In support, Defendant submits that this Court has jurisdiction over federal questions raised in Plaintiff's Amended Petition pursuant to 28 U.S. § 1331. In further support, Defendant would state as follows:

1. On August 4, 2016, Plaintiff commenced a civil action in Oklahoma State District Court, Oklahoma Court, case number CJ-2016-3950, and styled *Kandi Jones v. StanTech, LLC and Standard Testing and Engineering Company*. See Petition [Ex. 1].

2. On August 29, 2016, Plaintiff filed an Amended Petition, and restyled her action as *Kandi Jones v. Standard Consulting, LLC and Standard Testing and Engineering Company*. See Amended Petition [Ex. 2].

3. In her Amended Petition, Plaintiff seeks damages for, among other things, the Defendants' alleged violation of the Age Discrimination in Employment Act, 29 U.S.C. § 621 and Title VII of the Civil Rights Act, 42 U.S.C. §§ 2000(e), *et. seq.* See Amended Petition [Ex. 2].

4. Defendant Standard Testing and Engineering Company files this Notice of Removal within thirty (30) days after the receipt by the Defendant of papers from which it was first ascertainable that the case is one which is removable.

5. Defendant Standard Consulting consents to the removal of this action to this Court. See Consent to Removal [Ex. 3].

6. Supplemental jurisdiction over any attendant state law claims is authorized by 28 U.S.C. § 1367.

7. As per 28 U.S.C. § 1446(a) and Local Rule 81.2 of the United States District Court for the Western District of Oklahoma, a clearly legible copy of Plaintiff's Petition, Amended Petition, Consent to Removal, and the Entry of Appearances of Plaintiff's counsel, along with a copy of the docket sheet, has been attached hereto as Exhibit 1, 2, 3, 4 and 5 respectively. No other documents have been filed in this matter with the District Court of Oklahoma County, State of Oklahoma.

8. This Notice of Removal is signed pursuant to FRCP 11, in accordance with 28 U.S.C. § 1446(a).

9. Contemporaneous with the filing of this Notice of Removal, Defendant Standard Testing and Engineering Company is providing written notice of filing to Plaintiff and Defendant Standard Consulting and will file a copy of this Notice of Removal with the District Court of Oklahoma County, State of Oklahoma.

WHEREFORE, Defendant Standard Testing and Engineering Company respectfully submits that this Court has original jurisdiction on the basis of federal question jurisdiction, and through compliance with all applicable requirements for removal, has properly effectuated the removal of this civil action from the District Court of Oklahoma County, State of Oklahoma, to the United States District Court for the Western District of Oklahoma.

Respectfully submitted,

HOLDEN & CARR



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Company*

CERTIFICATE OF MAILING

I certify that on the 2nd day of September, 2016, a true and correct copy of the above and foregoing instrument was mailed, with proper postage fully prepaid thereon, to:

Mark Hammons, OBA #3784
Amber L. Hurst, OBA #21231
Leah Roper, OBA #32107
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